

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ContentGuard Holdings, Inc.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 2:13-cv-01112-JRG
)	
Amazon.com, Inc.; Apple Inc.; BlackBerry,)	
Limited (fka Research In Motion Limited) and)	
BlackBerry Corporation (fka Research In)	
Motion Corporation); HTC Corporation and)	
HTC America, Inc.; Huawei Technologies Co.,)	
Ltd. and Huawei Device USA, Inc.; Motorola)	
Mobility LLC; Samsung Electronics Co., Ltd.,)	
Samsung Electronics America, Inc., and)	
Samsung Telecommunications America, LLC.,)	
)	
Defendants.)	
)	

**NOTICE OF COMPLIANCE WITH THIRD PARTY CONFIDENTIALITY
PROVISIONS BY DEFENDANTS SAMSUNG ELECTRONICS CO., LTD., SAMSUNG
ELECTRONICS AMERICA, INC., AND SAMSUNG TELECOMMUNICATIONS
AMERICA, LLC**

Pursuant to paragraph 12 of the Amended Protective order, defendants Samsung Electronics Co., Ltd, Samsung Electronics America, Inc. and Samsung Telecommunications America, LLC file this notice of production of third-party confidential information and state:

1. AT&T: Samsung notified AT&T of its intent to produce AT&T's confidential documents by email dated December 4, 2014. The email informed AT&T of the specific items to be produced and included the Amended Protective Order. AT&T consented to the production under the terms of the Amended Protective Order.

2. T-Mobile: Samsung notified T-Mobile of its intent to produce T-Mobile's confidential documents by email dated December 12, 2014. The email informed T-Mobile of the specific

items to be produced and included the Amended Protective Order. T-Mobile consented to the production under the terms of the Amended Protective Order.

3. OMA: Samsung notified Open Mobile Alliance of its intent to produce OMA's confidential documents by email dated December 4, 2014. The email informed OMA of the specific items to be produced and included the Amended Protective Order. OMA consented to the production under the terms of the Amended Protective Order.

Respectfully submitted

Dated: December 18, 2014

By: /s/ Neil P. Sirota, with permission by
Michael E. Jones

Michael J. Barta
BAKER BOTTS L.L.P.
The Warner
1299 Pennsylvania Avenue
Washington, D.C. 20004-2400
Tel: (202) 639-7700

Neil P. Sirota
Robert L. Maier
Brian Boerman
BAKER BOTTS L.L.P.
30 Rockefeller Plaza
New York, NY 10112-4498
Tel.: (212) 408-2500

Michael E. Jones
SBN: 10929400
Mikejones@potterminton.com
Allen F. Gardner
SBN: 24043679
Allengardner@potterminton.com
Potter Minton, A Professional Corporation
110 North College, Suite 500
Tyler, TX 75702
Tel.: 903-597-8311
Fax: 903-593-0846

Attorneys for Samsung Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on December 18, 2014.

/s/ Michael E. Jones